

CALIFORNIA ENERGY COMMISSION

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Staff Supplement to CASE Report #2016-NR-ENV2

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Subject: Minimum Skylight Area, 2016-NR-ENV2-F

DESCRIPTION OF PROPOSED REGULATORY CHANGES

CASE report #2016-NR-ENV2-F, titled Minimum Skylight Area, proposes to make the following changes to the Standards:

- Add a minimum skylight area requirement to Section 140.3(c)1B.
- Add a definition of Window Head Height to Section 100.1.
- Revise and clarify access requirements of photosensors in Section 130.1(d)2D and 130.1(d)3B.
- Revise Parking Garage Daylighting requirements to specify that the primary and the secondary sidelit daylit zones be controlled independently from other light sources.
- Add a prescriptive requirement for the total skylight area of at least 3% to Section 140.3(c)4.
- Revise and clarify the Visible Transmittance (VT) requirement for Skylights for both conditioned and unconditioned spaces by including reference to Section 140.3(a)6D in Section 140.3(c)6.
- Add a new exception to minimum daylighting requirement for locations where daylight availability is limited.

Staff agrees with the proposed changes to Sections 100.1, 130.1(d)2 and 3, and 140.3(c)1B, 4, and 6, and have incorporated substantively similar changes into the proposed Express Terms.

Staff does not agree with the proposed changes to Section(s) 130.1(d)1B, 130.1(d)1C, and 140.3(c)1, and there are no associated changes to the sections in the Express Terms:

- Primary sidelit daylit zone is sufficiently defined under current language of Section 130.1(d)1B and the proposed change does not carry any new information.
- Secondary sidelit daylit zone is sufficiently defined under current language of Section 130.1(d)1C and the proposed change does not carry any new information.

- The combination total of at least 75 percent of the floor area of Section 140.3(c)1, is sufficiently defined in the current language. There is no need for revision as suggested in CASE Report proposal.

STAFF ANALYSIS AND CONCLUSION

Staff has analyzed the submitted CASE report and reached the following conclusions for the measures included in the Express Terms:

- Based on the evidence presented in the CASE Report, the measures, as proposed, appear to be cost effective and the author appears to have appropriately followed the Energy Commission's Life Cycle Cost methodology.
- Measure costs premiums presented in the CASE Report appear reasonable and appropriate for the measure proposed.
- Measure energy savings presented in the CASE Report appear to have been appropriately modeled and appear credible.
- Measure environmental impacts presented in the CASE Report appear reasonable and appropriate for the measure proposed.

Staff additionally finds that not making the proposed changes to Sections 130.1(d) and 140.3(c) as discussed above does not affect the analysis of the CASE report or alter its conclusions.